

October 16, 2012

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the Assignment of Licenses to Alaska Wireless Network, LLC, WT Docket 12-187, WC Docket 09-197 –
Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On Monday, October 15, 2012, Chris Nierman of General Communication Inc. (“GCI”) and John Nakahata of Wiltshire & Grannis, LLP on behalf of GCI and its operating subsidiaries GCI Communication Corp. and Unicom, Inc. (the “GCI Applicants”), and Richard Cameron of Alaska Communications Systems Group, Inc. (“ACS”) and I on behalf of ACS and its operating subsidiaries ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (the “ACS Applicants”), met with the staff of the Commission’s Wireline Competition Bureau (“WCB”), Wireless Telecommunications Bureau (“WTB”) and Office of General Counsel (“OGC”) listed below. The topic of discussion was the pending Assignment of License applications and the associated Petition for Declaratory Ruling in the above-captioned dockets.

In the meeting, ACS and GCI summarized the Petition for Declaratory Ruling and described how grant of the Petition is a necessary prerequisite to the parties’ closing of the Alaska Wireless Network (“AWN”) transaction that is the subject of the Assignment applications. The parties described the structural and contractual provisions that they have put in place to ensure that the Commission may find, consistent with its precedent, that each of the ACS Applicants and GCI Applicants will continue to have access to the spectrum being assigned to AWN, and will provide services over its own facilities for purposes of Section 214(e)(1)(A) of the Communications Act.

Marlene H. Dortch, Secretary
October 16, 2012

ACS and GCI pointed out that eligibility for universal service support will continue to be essential to providing advanced mobile voice and broadband services in high-cost areas in Alaska, and to low-income customers in the state; therefore grant of the requested declaratory ruling will serve the public interest. The parties acknowledged that the Commission's eligibility requirements for support mechanisms for mobile services may change, and new mechanisms may be developed in the future, so the parties intend to evaluate their needs and eligibility for future support as these rules are announced. Nevertheless, the requested rulings will help the parties ensure that they can comply with current requirements under the Communications Act and the Commission's rules.

The substance of the points presented by ACS and GCI may be found in the pending Applications and Petition for Declaratory Ruling in the above-captioned dockets. In response to a request from Commission staff, ACS and GCI will provide additional explanation of Commission precedent supporting their Petition in a further filing.

Please direct any questions regarding this matter to me.

Very truly yours,

/s/

Karen Brinkmann

*Counsel to Alaska Communications Systems
Group, Inc., ACS Wireless License Sub, Inc., and
ACS of Anchorage License Sub, Inc.*

cc: Rita Cookmeyer, WTB
Kathy Harris, WTB
Alex Minard, WCB
Kelly Quinn, WTB (by telephone)
Erik Salovaara, WTB
Paroma Sanyal, WTB
Susan Singer WTB
Jennifer Tatel, OGC
Margaret Wiener, WTB
Romanda Williams, WCB